



38070

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In Application of : COHEN et al.

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Serial No.: 09/651,800 : Group Art Unit: 2178

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Filed : August 30, 2000 : Examiner: Kyle R. Stock

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For : INTEGRATING DIVERSE DATA SOURCES USING A
MARK-UP LANGUAGE

Honorable Commissioner for Patents

P.O. Box 1450

Alexandria, Virginia 22313-1450

DECLARATION UNDER 37 CFR 1.131

Sir:

We, the undersigned, Simona Cohen, Tirtsu Hochberg, Haim Nelken, Ilan Paleiov and Pnina Vortman, hereby declare as follows:

1) We are the Applicants in the patent application identified above, and are the inventors of the subject matter described and claimed in claims 1-34 therein.

2) Prior to February 3, 2000, we conceived our invention, as described and claimed in the subject application, in Israel, a WTO country. Prior conception of the invention is evidenced by an IBM Invention Disclosure entitled, "Method and System for Integrating

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Diverse Data Sources Using XML," which is attached hereto as Exhibit A. The date of submission of this document, which is blacked out in Exhibit A, was prior to February 3, 2000.

3) The following table shows the correspondence between the elements of claim 1 in the present patent application and the content of Exhibit A:

Claim 1	Exhibit A
A method for processing source data from a plurality of diverse sources in a selected data domain	Page 3, section (2) "Define the Invention": "We present a novel method... for integrating diverse data sources... [using] a unified schema represented in a Document Type Definition..." Page 4, "Basics of operation": "Create a unified schema DTD for the selected domain."
specifying a unified schema that is defined specifically for the selected data domain, from among a multiplicity of schemata that are specific to different data domains	Page 4, "Basics of operation": "Create a unified schema DTD for the selected domain... Over time, there will exist DTDs... for all domains. Thus, one would need just to select its appropriate DTD."

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selected from a group of domains consisting of computer system performance evaluation, customer relationship management, healthcare, and telecommunications	<p>Page 2: "Examples of such applications include:</p> <ul style="list-style-type: none"> • Analyzing System Performance... • Customer Relationship Management..." <p>We identified other domains (such as healthcare and telecommunications) in the course of reducing the invention to practice.</p>
the specified schema listing markup tags in the selected data domain that can exist in a document in the markup language	<p>Page 3, section (2) "Define the Invention": "The unified data is represented in XML and complies to the unified schema DTD." It was well known that markup languages, such as XML, use markup tags, which are listed in the DTD. As noted above, a DTD is defined for each domain.</p>
defining correspondences of data fields from the sources to the markup tags listed by the selected schema	<p>Page 4, "Basics of operation": "3. The Administrator creates mappings from the data sources to the unified schema DTD."</p>
mapping the source data in accordance with the correspondences to generate unified data in the markup language	<p>Page 4, "Basics of operation": "4. The Lookup Engine creates unified data according to the mappings and the unified schema DTD."</p>

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4) On February 6, 2000, we presented a plan for pilot development of a system of the type described in the present patent application. The system, which we called the "Unified Customer Reporting (UCR) Pilot," was described in a presentation to IBM management that is attached hereto as Exhibit B. (The date on the first page of the presentation, "3.2.2000" means that the presentation was completed on February 3, 2000, following several days of preparation.) The work plan and other aspects of the project were described in a memorandum entitled "UCR Pilot - Plan for 2000," dated February 6, 2000, which is attached hereto as Exhibit C. The plan called for intensive activity throughout the year 2000, as indicated, for example, by the list of milestones on page 7 of the memorandum.

5) Following the presentation, a decision was made by IBM management to proceed with this pilot project, with the cooperation of groups at other IBM facilities in addition to our group at the IBM Haifa Research Laboratory. Project meetings and telephone conferences were held roughly once a week. Minutes of the meetings were recorded in a project "teamroom" in the IBM Lotus Notes database, along with other information pertinent to the project. Selections from the teamroom records are attached hereto as Exhibit D. It can be seen in this exhibit that we worked diligently on reducing this invention to practice throughout at least the months of February through June, 2000.

6) On May 2, 2000, we met with Dr. Daniel Kliger, of

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Sanford T. Colb & Co., who was retained by IBM as outside counsel for the purpose of preparing the present patent application. A copy of a memorandum regarding this meeting is attached hereto as Exhibit E. (The cost estimate in the memorandum is blacked out for reasons of confidentiality. It is not pertinent to the issues at hand in this Declaration.)

7) In a prior declaration under 37 CFR 1.131, filed July 14, 2006, in response to the previous Official Action in this case, we provided the draft of the present patent application that Dr. Kligler sent to us on June 22, 2000. We also presented proof that we continued our diligence in reduction of the invention to practice during the period between June 29 and August 30, 2000, when the present patent application was filed. Our prior declaration is incorporated herein by reference.

8) Thus, to summarize, following conception of this invention prior to February 3, 2000, we were diligent in reduction of the invention to practice throughout a period beginning before February 3, 2000, and continuing until the constructive reduction to practice of the invention on August 30, 2000.

We hereby declare that all statements made herein of our knowledge are true and that all statements made on information and conjecture are thought to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code

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and that such willful false statements may jeopardize the
validity of the application of any patent issued thereon.

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